

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
)	
Advanced Communications Provisions of the)	CG Docket No. 10–213
Twenty-First Century Communications and)	
Video Accessibility Act)	
)	
To: The Commission)	

REPLY COMMENTS OF PURPLE COMMUNICATIONS, INC.

Purple Communications, Inc. (“Purple”) submits these comments in reply to the comments submitted to the Federal Communications Commission’s (“FCC” or “Commission”) October 21, 2010, Public Notice, DA 10-2029, soliciting public input “on the extent to which equipment used by people with disabilities for point-to-point video communications and video relay services should be considered equipment used for ‘interoperable video conferencing service’ under the recently enacted Twenty-First Century Communications and Video Accessibility Act of 2010.”

Purple supports a leadership role by the Commission to ensure that mainstream video conferencing equipment and software, particularly those used in telecommunication devices, be interoperable with video conferencing systems that are used for video relay services (“VRS”). We also believe that this process should include the utilization of the North American Numbering Plan (“NANP”) in those video conferencing systems. In this sense, we echo other commenters seeking integration of mainstream video conferencing equipment and software with VRS.

Purple also concurs with the National Association of the Deaf and other consumer organizations that the Commission should explore ways to combine video and captioned telephone relay services. This is necessary because there are still consumers who cannot gain equivalent communication access without the combination of both services.

There are still numerous individuals who do not yet have access to telecommunication services, including the various forms of relay services. One of the leading reasons for this is the fact that none of the existing relay services available to them meet their particular needs for communications. The integration of video and captioned telephone relay services will, for example, make telecommunication services accessible to those individuals who rely on English as their native language but need sign language or lip reading to fully understand other parties. The combination of both services will narrow the functional equivalence gap for many deaf and hard of hearing individuals as contemplated by Section IV of the Americans With Disabilities Act, 47 U.S.C. § 225.

Respectfully submitted,

PURPLE COMMUNICATIONS, INC.

By: /s/
Kelby Brick, Vice President, Regulatory
and Strategic Policy
2118 Stonewall Road
Catonsville, MD 21228
(410) 988-4018
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